

Exhibit A



U.S. Department of Justice

Civil Division
Federal Programs Branch
1100 L Street, N.W., Room 11012
Washington, D.C. 20530

Lisa A. Olson
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March 15, 2019

The Honorable Dan A. Polster
Carl B. Stokes United States Courthouse
801 West Superior Avenue
Cleveland, OH 44113-1837

Re: *In re Nat'l Prescription Opiate Litig.*, Case No. 1:17-MD-2804 (N.D. Ohio)

Dear Judge Polster:

At the Court's request, the U.S. Department of Justice ("Department") has looked into the question of whether Carole Rendon, while participating in or heading the Heroin and Opioid Task Force ("Task Force"), received "information that was not then publicly available, that was shared in a confidential way, and which she is somehow using now defending Endo in allegations brought by the [C]ity of Cleveland and [Cuyahoga] County." Transcript of Proceedings on Pls.' Motion to Disqualify 12:18-25 (Feb. 6, 2019) (hereinafter "Tr."). The Department's inquiry yielded affirmative responses to the question "did Carole Rendon receive confidential information, that is, information that was not then publicly available, that was shared in a confidential way, at the Heroin and Opioid Task Force meetings, or in other meetings or communications that flowed from or came out of the Task Force."

Specifically, our information indicates that Cuyahoga County and Cleveland law enforcement officials shared nonpublic information with Ms. Rendon and her direct reports as a result of the cooperation among federal, state, and local law enforcement agencies in combatting the opioid crisis. This information was conveyed primarily in meetings (*e.g.*, "sidebars") and communications arising out of the Task Force, and was shared in a spirit of confidence and trust. The information concerned the inadequate staffing levels, funding deficiencies, strategies, initiatives, operations, and allocation of resources at the county and local levels for dealing with the opioid crisis. The Department is not in a position to address whether Ms. Rendon has used or is using such information in "defending Endo." *See* Tr. 128:24.

Please let me know if we may be of further assistance.

Respectfully,

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/s/ Lisa A. Olson

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